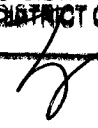


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AUG 16 2019

CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY  DEPUTY

Cedrc Earl Hill Jr  
Private Attorney General  
Nation Texas  
Bryn Mawr Lane 400  
Van Alstyne  
United States Minor, Outlying Islands {75495-9998}

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS - SAN ANTONIO DIVISION

Cedrc Earl Hill Jr

Plaintiff(s),

vs.

Pleasanton Police Department  
Earnest J Venegas (Individual Capacity),  
Kia Viesca (Individual Capacity)  
Jordan Harden (Individual Capacity)  
Ernest Guerra (Individual Capacity)  
Defendant(s)

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Constitutional violations,  
Freedom of Information Act  
Violation

Case No: TBD

**Complaint**

**INTRODUCTION**

This matter is being brought before this court under title Title 5 USC § 552 Freedom of Information Act

**VIOLATION (S)**

- 1) 2 USC chapter 26 § 1601 Open Government Any of 2007
- 2) 5 USC § 552 Freedom of Information Act

**JURISDICTION**

The district court has jurisdiction over this matter based upon Federal questions concerning the Constitution of the United States of America, and the Laws of the United States via Article III of the Constitution of the United States of America, as well as Common Law.

Also, the amount in controversy in this matter exceeds \$75,000 because you can not place an actual value on ones actual liberty and freedom of locomotion without restriction

**CAUSE OF ACTION**

This matter is being brought before this court under title Title 5 USC § 552 Freedom of Information Act Violations

### ELEMENTS OF THE CAUSE OF ACTION

The linchpin of our democracy is Human rights, so when those rights are infringed upon by those who are chosen to aide in protecting those rights, there has to be a responsibility placed upon those who chose to allow these actions to take place as well as become actors within this horrid acts upon another without just cause.

- 1) On June 6, 2019 Cedrc Earl Hill Jr was deprived of his liberty and the subjecting incarceration placed him in the automatic same conditions as convicted felons in a unconstitutional punishment via **Bell v Wolfish 441, US 520 (1979)**. Defendants could only be deprived of liberty as a matter of "compelling necessity". No NECESSITY was stated in any manner for this action to take place without being taken before the Judge who signed off on any warrant for the arrest of Cedrc Earl Hill Jr.
- 2) Under the guidelines of the Freedom of Information Act and the Open Government Act of 2007, the receiving government agency has 20 days from the time of recieving the request for information from and authorized party excluding weekends and federal holidays to respond, along with an additional 10 days when requested in writing as an extension for clarification of the request to which in this matter has not been requested but has also elapsed if such a request had existed.
  - a. On June 27, 2019 The police department to which had arrested Cedrc Earl Hill Jr along with several other government agencies were notified and has signed for the information request to which no answer nor response was received by Cedrc Earl Hill Jr.
  - b. 20 days from that day would end on July 26, 2019
  - c. 10 Days which would allow for the written request for extension, which has never asked for by either party would have ended August 9, 2019.
- 3) As well as there is an active Case against Cedrc Earl Hill Jr  
Case Number 2019004367  
Citation 19SG-299-F3  
Citation 19SG-298-5JF  
Citation 19SG-297-A  
Citation 19SG-296-B

And information regarding this matter needs to be made available to the defendant in order for him to prepare a defense for his liberty as well as a show of cooperating with the duty of "Due Process" and "Good Faith" because at this point, the defendants as well as their supervisors are not operating with "Clean Hands" with regards to this matter to this point. **Brady v Maryland 373 US 83 (1963)**

### REMEDY

The actions of each of the defendants above as well as their blatant disregard to honor their oath and duty requirements of LAW are the very reason this matter is being filed. The information requested does not fall under the 1976 Government in the Sunshine Act to which would allow for a denial or a complete ignoring of the specific request of a citizen directly involved in an action with them.

The remedy of their failure to act as required by law is an immediate release of all documents, evidence, and records being requested as in regards to the matter to which Cedrc Earl Hill Jr name, image or likeness is present.



Cedrc Earl Hill Jr

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